



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 6, 2020

By ECF

Honorable James Orenstein
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Ramrattan v. DeJoy, et al.*, No. 19-CV-00210 (WFK) (JO)

Dear Judge Orenstein:

This Office represents Defendants Louis DeJoy, Postmaster General, and the United States Postal Service (collectively, "Defendants"), in the above-referenced employment action. The parties jointly request a referral of this case to the EDNY's Court-annexed mediation program, and, in the event mediation is unsuccessful, a thirty-day extension of the period for conducting discovery following the completion of mediation.

On Monday, October 5, 2020, Plaintiff notified the undersigned Assistant that he had sent an email to Your Honor *ex parte* on Friday, October 2, 2020 in connection with his numerous, unsuccessful attempts to retain an attorney to represent him in this matter. Plaintiff states that he has diligently contacted more than 30 attorneys, and spent more than \$1000 in consultation fees in his attempt to retain an attorney, after his prior attorney was disbarred. Plaintiff also expressed an interest in exploring mediation.

The parties have conferred and jointly request a referral of this case to the EDNY's Court-annexed mediation program, in an attempt to resolve this case without the need for further litigation.

To date, the parties have exchanged written discovery. The government has attempted numerous times to schedule Plaintiff's deposition. Plaintiff, however, has not made himself available for his deposition because he does not feel comfortable attending his deposition without an attorney. The Court previously ordered the parties to complete discovery by Friday, October 9, 2020 (Dkt. No. 35). In the event the parties are unable to resolve this case, the parties request a 30-day extension of time to complete discovery after the parties have concluded the mediation.

In light of the request to refer this case to mediation, the parties further request an adjournment of the pre-trial/settlement conference previously scheduled for October 22, 2020.

Respectfully submitted,

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